

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Gregg Lurie, Heidi Kaliher, and Tracy
Knight,

Case No. 23-cv-00440 (KMM/DLM)

*individually, and on behalf of
those similarly situated,*

Plaintiffs,

v.

**JOINT MOTION AMENDING
DEADLINES**

North Memorial Health Care,
d/b/a North Memorial Health,

Defendant.

Plaintiffs Gregg Lurie, Heidi Kaliher, and Tracy Knight, on behalf of themselves and all others similarly situated, (“Plaintiffs”) and Defendant North Memorial Health Care (“Defendant”), by and through their respective counsel, hereby submit this joint motion for an extension of certain deadlines:

WHEREAS, the Court entered a Pretrial Scheduling Order on June 13, 2024. (Dkt. No. 63).

WHEREAS, the Order directed the Parties to complete fact discovery by June 1, 2025.

WHEREAS, the Parties require additional time to complete fact discovery and believe that an extension of time would allow the Parties to finish producing documents, conducting discovery, take necessary depositions, and complete other discovery related tasks.

WHEREAS, to allow the Parties more time to conduct discovery, the Parties believe that the following schedule should allow the Parties time to finish producing documents, conducting discovery and complete other discovery related tasks:

- a. Fact discovery shall be completed by October 2, 2025;
- b. All non-dispositive motions and supporting documents, including those which relate to discovery, shall be served and filed on or before October 9, 2025;
- c. Plaintiffs will provide the identity of their class certification experts to Defendant by November 3, 2025;
- d. Plaintiffs' motion for class certification and any expert declarations in support of the motion must be filed on or before December 4, 2025;
- e. Defendant will provide the identity of its class certification experts by December 18, 2025;
- f. Class certification expert discovery, including depositions, shall be completed on or before March 12, 2026;
- g. Defendant shall file its opposition to the Plaintiffs' motion for class certification and any expert declaration in support of the opposition by February 12, 2026;
- h. All non-dispositive motions which relate to class certification expert discovery shall be filed and served on or before March 26, 2026 (any motions to exclude an expert under Federal Rule of Evidence 702 will be briefed with any dispositive motions);

- i. Plaintiffs shall file their reply brief in support of class certification and any rebuttal expert declarations in support by April 23, 2026; and
- j. Within 14 days following a ruling on Plaintiffs' motion for Class Certification, the parties shall contact the Court to set a scheduling conference.

WHEREAS, the Parties believe that good cause exists for these requested extensions because the parties require additional time to conduct discovery.

WHEREAS, the Parties have conferred and agree to the relief sought herein.

WHEREAS, all remaining deadlines in the Pretrial Scheduling Order (Dkt. No. 63) that post-date this stipulation shall be vacated, excluding the deadlines to submit confidential status letters to the Court, which the parties intend to discuss with the Court at the May 16, 2025 Status Conference.

THEREFORE, the Parties respectfully request that the Court grant their joint motion to extend the aforementioned discovery deadlines.

Dated: May 15, 2025

s/ Rachel K. Tack

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Dated: May 15, 2025

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